



ORIGINAL
(Red)

**Sun Refining and
Marketing Company**
Ten Penn Center
1801 Market Street
Philadelphia PA 19103-1699

June 28, 1988



SDMS DocID 2184602

HAND DELIVER

Mr. Lawrence Falkin
U.S.E.P.A. Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Street
Philadelphia, PA 19107

RE: Metro Container Corporation Site

Dear Mr. Falkin:

Enclosed is our completed response to your
information request dated April 12, 1988.

If you have any questions, please contact me at
(215) 977-3778.

Very truly yours,

Linda L. Hahn
Investigator
Litigation Services

LLH:ds

Enclosures

cc: E. J. Ciechon (w/o enc.)
J. A. Rosen (w/o enc.)
D. A. Smith (w/o enc.)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III ORIGINAL
(Red)

In re: Metro Container Corporation Site:
Trainer, Pennsylvania:

AFFIDAVIT

The Undersigned, being duly sworn according to law, states the following:

1. I am a lawyer on the Legal Staff of Sun Refining and Marketing Company ("Sun") and am responsible for representing Sun in the matter pending before the United States Environmental Protection Agency Region III ("USEPA") pertaining to the Metro Container Corporation Site.
2. I have been responsible for responding to Information Request submitted to Sun by USEPA pertaining to the site.
3. In connection with that request, I have supervised a search of Sun's records which I believe was sufficient to locate any documents in Sun's possession which would be responsive to the Information Request. I have also supervised an interviewing process of current and former employees of Sun and its predecessor companies who by reason of their current and/or former responsibilities may have had recollections of information sought in the Information Request.
4. Based on the foregoing, Sun has located the attached documents which Sun believes are responsive to the Information Request. Packet No. 1 contains correspondence and contracts. Packet No. 2 contains accounting documents (invoices, delivery tickets, etc.)
5. Except for the information referenced in paragraph 4, Sun has been unable to locate any documents that are responsive to the Information Request.


James A. Rosen, Esquire

Sworn to before me
this 28th day of
JUNE, 1988.


Notary Public

LINDA L. HAHN, NOTARY PUBLIC
PHILADELPHIA, PHILADELPHIA CO.
MY COMMISSION EXPIRES 2/24/90